



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

The weight of authority, following *Milliken v. Pratt* (1878) 125 Mass. 374, is that a married woman's capacity to contract is to be determined by the law of the place where the contract is made rather than by that of her domicile. *A fortiori* is this true where the place of making and the place of performance coincide, as here. The dissent seeks to bring the case within the rule as to contracts contrary to the settled policy of the forum, being apparently influenced largely by the fact, not discussed by the majority, that the note was given to an Oregon assignee of a debt previously contracted in Idaho. *Cf.* as to extra-territorial effect of disability to contract marriage (1917) 27 YALE LAW JOURNAL 131.

CONSTITUTIONAL LAW—EQUAL PROTECTION OF THE LAWS—OHIO WORKMEN'S COMPENSATION ACT.—The Compensation Act of Ohio provides for compulsory contribution by employers to a state insurance fund from which compensation is paid to injured employees; but section 22 authorizes "employers who will abide by the rules of the state liability board of awards and may be of sufficient financial ability or credit to render certain the payment of compensation," to pay individually and directly to the injured employees the compensation provided for in the Act. In proceedings to oust certain insurance companies from the franchise of writing accident insurance for such employers, the constitutionality of section 22 was challenged on the ground that it prevented the Act from having a uniform operation. *Held*, that the section was a valid enactment. *State v. United States Fidelity etc. Co.*

The constitutionality of other sections of the Ohio Act was upheld in *Porter v. Hopkins* (1914) 91 Oh. St. 74, 109 N. E. 629. As to the validity of compensation acts in other states, see (1917) 26 YALE LAW JOURNAL 618; 27 *ibid.* 136.

CONSTITUTIONAL LAW—FREEDOM OF CONTRACT—MINIMUM WAGE LAW FOR WOMEN.—In 1915 Arkansas enacted "an act to regulate the hours of labor, safeguard the health and establish a minimum wage for females." In proceedings by the State, the defendant contended that the portion of the act which relates to fixing wages was unconstitutional. *Held*, that the act was a valid exercise of the police power, being a regulation tending to guard the public morals and public health. McCulloch, C. J., *dissenting*. *State v. Crowe* (1917, Ark.) 197 S. W. 4.

A similar statute in Oregon was upheld by the Supreme Court of that state, and its decision was recently affirmed by the federal Supreme Court without opinion, the court being equally divided. *Stettler v. O'Hara* (1914) 69 Oreg. 519, 139 Pac. 743; s. c. (1917) 243 U. S. 629, 37 Sup. Ct. 475. *Cf. The Oregon Ten Hour Law* (1917) 26 YALE LAW JOURNAL 607.

CONSTITUTIONAL LAW—QUALIFICATIONS OF VOTERS—WOMAN SUFFRAGE IN CITY ELECTIONS.—The charter of East Cleveland conferred upon women the right to vote in city elections. The petitioner sought by mandamus to enforce her right, the defendant election officials contending that the charter provision violated Sec. 1, Art. V of the Constitution which declares that "every white male citizen . . . shall have the qualifications of an elector, and be entitled to vote at all elections." *Held*, that the charter was valid since the Constitutional definition of the qualifications of electors is controlling only in offices and elections of Constitutional origin or cognizance and does not embrace municipal elections. Jones, J., *dissenting*. *State, ex rel. Taylor v. French* (1917, Oh.) 117 N. E. 173.

Many of the conflicting authorities are collected in the opinions.